

1 HEATHER E. WILLIAMS, CA Bar #122664
Federal Defender
2 KARA R. OTTERVANGER, CA Bar # 354424
Assistant Federal Defender
3 Office of the Federal Defender
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950
Kara_Ottervanger@fd.org

6 Attorneys for Defendant
7 EDWIN ANGULO

8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 EDWIN ANGULO,

15 Defendant.

Case No. 1:24-cr-00069-JAM-BAM

**STIPULATION TO CONTINUE
SENTENCING HEARING; ORDER**

Date: January 21, 2025
Time: 9:00 a.m.

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18 IT IS HEREBY STIPULATED, by and between the parties, through their respective
19 counsel, Assistant United States Attorney Arin Heinz, counsel for plaintiff, and Assistant Federal
20 Defender Kara R. Ottervanger, counsel for defendant Edwin Angulo, that the Court may continue
21 the sentencing hearing from January 21, 2025, to **March 11, 2025, at 09:00 a.m.**

22 On December 6, 2024, the Court *sua sponte* re-scheduled the sentencing hearing from
23 January 28, 2025, to January 21, 2025. [ECF # 27]. The parties, in consultation with assigned U.S.
24 Probation Officer Miranda Lewis, determined that, given the upcoming holidays and other
25 workload—including a trial and numerous other Pre-Sentence Investigation Report (PSR)
26 deadlines—the January 21, 2025, date would be difficult to accommodate. To ensure that the PSR,
27 responses/objections thereto, and sentencing memorandum in this matter are completed
28 thoroughly, the parties and Probation believe a continuance is necessary.

1 The parties further stipulate and request that the date for responding to any Presentence
2 Investigation Report and any sentencing memorandum be continued in accordance with this
3 stipulation and the Court's order thereon.

4 Probation and all parties shall adhere to the following schedule, unless later modified by
5 this Court:

6 Judgment and Sentencing **March 11, 2025**
7 Date:

8 Reply, or Statement of Non- **March 04, 2025**
9 Opposition:

10 Formal Objections to the
11 Presentence Report shall be
12 filed with the Court and served
13 on the Probation Officer and
14 opposing counsel no later than: **February 25, 2025**

15 The final Presentence Report
16 shall be filed with the Court
17 and disclosed to counsel no
18 later than: **February 18, 2025**

19 Counsel's informal written
20 objections to the Presentence
21 Report shall be delivered to the
22 Probation Officer and
23 opposing counsel no later than: **February 11, 2025**

24 The draft Presentence Report
25 shall be disclosed to counsel
26 no later than: **January 28, 2025**

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Respectfully submitted,

PHILLIP A. TALBERT
United States Attorney

Date: December 9, 2024

/s/ Arin Heinz
ARIN HEINZ
Assistant United States Attorney
Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: December 9, 2024

/s/ Kara R. Ottervanger
KARA R. OTTERVANGER
Assistant Federal Defender
Attorney for Defendant
EDWIN ANGULO

ORDER

GOOD CAUSE APPEARING, the Court hereby continues the sentencing hearing currently scheduled for January 21, 2025, to **March 11, 2025, at 09:00 a.m.**

Dated: December 11, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE